

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
MCALLEN DIVISION**

<b>UNITED STATES OF AMERICA</b>	§	
	§	
<b>VS.</b>	§	<b>CRIMINAL NO.</b>
	§	<b>7:15-cr-00762-2</b>
<b>ERMIT MARIE DE LA TORRE</b>	§	

**MOTION FOR CONTINUANCE**

**COMES NOW ERMIT MARIE DE LA TORRE**, Defendant, and file her Motion for Continuance and in support would show the court as follows:

**I.**

This case is scheduled for Sentencing on December 1, 2016 at 10:00 am.

**II.**

Counsel for Defendant is requesting this Honorable Court to Continue the Sentencing due to the fact Counsel is began trial on November 14, 2016 and has continued thru the week of December 2, 2016 for

***Cause No. F-4421-12-1: In the Interest S.M., Minor Child in the County Court One (1)  
at the Hidalgo County Courthouse in Edinburg, Texas.***

The Counsel for the defendant has discussed the continuance with the Assistant United States Attorney, Michael Day and has indicated that they have no objection to the continuance.

We pray this court reschedules this case at the court's convenience. Counsel apologizes for any inconvenience.

WHEREFORE PREMISES CONSIDERED, Defendant requests that her Motion for Continuance be granted and that this case be reset to a date at the Court's discretion.

Respectfully submitted,  
SALINAS/FLORES  
2011 N. Conway  
Mission, Texas 78572  
Tel. (956) 584-3900

/s/ Ricardo L. Salinas  
RICARDO L. SALINAS  
Federal ID No. 19693

**CERTIFICATE OF CONFERENCE**

I certify that I have conferred with the Assistant United States Attorney requesting relief for Defendant's *Motion to Continue* and said United States Attorney is

☐ Opposed  
☒ Unopposed  
☐ Unable to Confer  
☐ Not taking a position

/s/ Ricardo L. Salinas  
RICARDO L. SALINAS

**CERTIFICATE OF SERVICE**

I certify that on November 29, 2016 a true and correct copy of Defendant's *Motion to Continue* was served via the District's Electronic Filing System on the following parties:

*Michael Day*  
*Assistant United States Attorney*  
*Southern District of Texas*  
*McAllen, Division*  
[michael.day@usdoj.gov](mailto:michael.day@usdoj.gov)

/s/ Ricardo L. Salinas  
RICARDO L. SALINAS